

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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GOLDIE J. LORCH, on behalf of herself and  
similarly situated employees,

Plaintiff,

v.

FIRST NATIONAL BANK OF  
PENNSYLVANIA

Defendants.

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: CIVIL ACTION  
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: NO. 2:13-cv-0894  
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: Judge McVerry  
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**CONSENT MOTION TO EXTEND DATE FOR  
MOTION TO DECERTIFY COLLECTIVE ACTION**

For the reasons stated below, defendant requests that the Court modify the Case Management Order by extending by one week the date by which defendant must file its Motion to Decertify Collective Action.

1. The Case Management Order was filed on April 16, 2014, and directed that discovery be completed by August 15 and that defendant file its Motion to Decertify Collective Action, if one was to be filed, by September 15, 2014.

2. Although defendant served its written discovery requests within sufficient time to be answered by the Motion Deadline, plaintiffs have been delayed in getting their responses to counsel for defendant. Defendant initially granted a requested extension that expired on September 10, the date of this Motion. Today, counsel for plaintiffs requested an additional extension until Friday, September 19, 2014, and consented to a commensurate extension of the decertification motion deadline.

3. Defendants would like to have plaintiffs' discovery responses before filing its Motion to Decertify, which it does plan to file.

4. Plaintiffs consent to the granting of the extension. No party will be prejudiced by an extension.

5. There have been no previous requests to modify the April 16, 2014 Case Management Order.

WHEREFORE, Defendant prays that its motion be granted and that the deadline to file a Motion to Decertify Collective Action be extended to September 22, 2014.

Respectfully submitted,

s/John J. Myers

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